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April 17, 2023

**VIA ECF**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Re: *Erin Dicks v. NYC Health and Hospitals Corp. and Tandym Group LLC* -22-CV-6515

Dear Judge Furman:

As you are aware, our law firm represents Defendants NYC Health and Hospitals Corp. ("HHC"), and Tandym Group LLC, f/k/a The Execu-Search Group ("Tandym"), collectively referred to as Defendants, in this action. We write with Plaintiff's counsel to request a stay of discovery while the parties work in good faith toward mediation and potential settlement.

On March 1, 2023, the parties appeared before your honor for an Initial Pretrial Conference. During that conference, the parties agreed to engage in additional discovery with the hope that the case would resolve prior to depositions and a Rule 34 site visit. After an additional exchange of documents, the parties agreed to participate in a private mediation with Mediator Marc Isserles currently scheduled for June 13, 2023.

For that reason, the parties request that all discovery be stayed by 60 days in order to avoid additional attorneys' fees, while the parties prepare for mediation and that all other upcoming discovery deadlines be extended by 60 days, including but not limited the deadline to provide written responses to discovery, conduct depositions and the Rule 34 site visit and the completion of fact discovery (currently June 30, 2023).

Thank you for your consideration.

Respectfully,

/s/ Melissa Friedland

Melissa Friedland

cc: Michele Caiola, Esq. (via ECF)

The Court will not stay the case, but will extend the discovery deadlines to allow the parties to focus on settlement. To that end, the fact discovery deadline is EXTENDED to **August 29, 2023**, and the expert discovery deadline is EXTENDED to **October 13, 2023**. Any interim discovery deadlines can be modified by the parties without leave of the Court., see ECF No. 33, ¶ 9(f), as long as all discovery is completed by the above deadlines. Additionally, the July 5, 2023 pretrial conference is hereby ADJOURNED to **September 6, 2023, at 9:00 a.m.** The Clerk of Court is directed to terminate ECF No. 35. SO ORDERED.

A handwritten signature in black ink, appearing to read "J. Furman", written over the typed name of the judge.

April 17, 2023